



The White Hills Park Federation Trust
A Culture of Excellence

Management and Retention of Records

DRAFT

Policy Date: June 2018

Next review date: June 2021

The White Hills Park Federation Trust Management and Retention of Records Policy

The Trust recognises that certain documents must be retained under statutory legislation or by regulations imposed upon it by other organisations, for example the Department for Education (DfE). Academy Trusts have additional responsibilities for the retention of records under the Companies Act 2000 and the Charities Act 2011. However The General Data Protection Regulations (GDPR) clearly states that records must not be retained longer than necessary.

This policy should be read in conjunction with the following documents:

- The General Data Protection Regulations Policy
- Freedom of Information – publication scheme
- And with other legislation or regulations (including audit, equal opportunities and ethics) affecting the Trust.

Scope of the policy

This policy applies to all records created, received or maintained by staff of the Trust in the course of carrying out its functions designated in its Articles of Association and Funding Agreements. These records are covered in broad terms as:

- Student
- Child protection
- Curriculum
- Staff
- Management
- Health & Safety
- Administration
- Finance
- Property
- School meals
- DfE, Local Authority (LA), work experience and careers, family liaison
- Governance

Records are defined as all those documents which facilitate the business carried out by the school and which are thereafter retained (for a set period) to provide evidence of its transactions or activities. These records may be created, received or maintained in hard copy or electronically.

Responsibilities

The Trust has a corporate responsibility to maintain its records and record keeping systems in accordance with the regulatory environment. The person with overall responsibility for this policy is the Executive Principal. The Executive Principal will delegate the day to day management of this policy to the individual Head of School for each school within the Trust.

The person responsible for records management in the school will provide guidance for good records management practice and will promote compliance with this policy so that information will be retrieved easily, appropriately and in a timely way. They will also monitor compliance with this policy at least annually to check if records are stored securely and can be accessed appropriately.

Individual staff and employees must ensure that records for which they are responsible are accurate, and are maintained and disposed of in accordance with the school's records management guidelines.

The Trust utilises the guidelines set out in the Records Management Toolkit for Schools version 5 (Updated in 2016) and can be found on the Information and Records Management Society's (IRMS) website or by following the link below:

https://c.ymcdn.com/sites/irms.site-ym.com/resource/collection/8BCEF755-0353-4F66-9877-CCDA4BFEEAC4/2016_IRMS_Toolkit_for_Schools_v5_Master.pdf

There are a number of benefits which arise from the use of a complete retention schedule:

- Managing records against the retention schedule is deemed to be "normal processing" under the GDPR and the Freedom of Information Act 2000.
- Members of staff can be confident about safe disposal information at the appropriate time.
- Information which is subject to Freedom of Information and Data Protection legislation will be available when required.
- The Trust is not maintaining and storing information unnecessarily.
- Additional guidelines specifically for Academy Trusts, which have financial reporting responsibilities under the Companies Act 2006 and The Charity Commission, are also followed and are set out in the Charity Commission's guidance document "Retention of accounting records" produced by Buzzacott LLP:
<http://www.buzzacott.co.uk/getattachment/64ced867-bdc1-4906-862e-6b6fdea1a64e/retention-of-accounting-records-%281%29>

Archives

All old student, staff, financial and other records will be archived in accordance with this policy until the due time at which time they will be disposed of securely. Archived records will:

- Be treated as confidential
- Will be stored securely, with limited access
- May be kept in either paper or electronic formats.

Disposal of Records

When the period of retention has expired, and there is no other reason to retain them, the records will be disposed of. This will be subject to what format they are stored in, electronic data will be erased and paper will be disposed of via a reputable and GDPR compliant confidential waste contractor.

Review

This policy will be reviewed every three years or sooner on any legislative or guidance changes.